

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)

)
Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)

and)

)
Examination of Exclusivity and)
Frequency Assignment Policies of)
the Private Land Mobile Radio Services)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

PR Docket No. 92-235

To: Private Wireless Division,
Wireless Telecommunications Bureau

**REPLY COMMENTS OF THE AMERICAN AUTOMOBILE ASSOCIATION
WITH RESPECT TO INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.
TECHNICAL BLUEPRINT FOR FREQUENCY USE LIMITATIONS**

The American Automobile Association ("AAA"), by its attorney, submits the following reply to comments of the Affiliated American Railroads (AAR) with respect to the Technical Blueprint for Frequency Use Limitation in the Post-refarming Environment recently filed with the Commission by the Industrial Telecommunications Association, Inc. (ITA).¹

AAA is completely in agreement with the Affiliated American Railroads (AAR) that, at least for certain safety related services such as the Automobile Emergency Radio Service (AERS) and the Railroad Radio Service, the Commission should retain the existing eligibility limitations on frequencies in the post-

¹ See Public Notice, Mimeo No. DA 97-206, released January 28, 1997.

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consolidation environment. AAA therefore requests the Commission to retain the current Rule Section 90.95(d)(1), (d)(4) and (d)(5) limitations on the AERS frequencies.

AAA has gone on record in this proceeding in requesting the Commission to maintain the status quo with respect to the various radio services. The reasons which caused the Commission to create the AERS in the first place are as valid today as they were when the service was created. Indeed, increased congestion on the highways and a greater danger of violence for stranded motorists make the need for specific AERS frequencies all the more compelling.

Nevertheless, AAA recognizes that there is a strong push within the Commission to consolidate the various radio services into a smaller number. Whether the Commission ultimately places the AERS frequencies in a "public service" pool, as AAA has proposed in recent comments, or into a pool consisting of the current Land Transportation Radio Services, or into a much larger pool as ITA has proposed, the Commission should maintain the current restrictions on eligibility for licensing on the frequencies now allocated to the AERS.

AAA does not object to allowing non-AERS licensees to be licensed on vacant AERS frequencies, but only with the concurrence of AAA, pursuant to interservice coordination protocols. In this way, AAA may evaluate the potential for interference to AERS operations. ITA's proposal for a notification process is simply unworkable. It will result in the

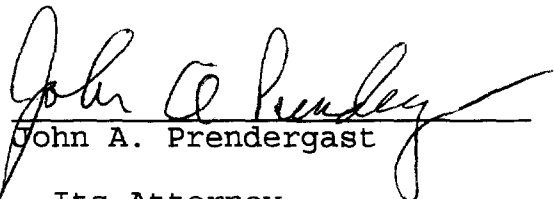
Commission becoming drawn into disputes between coordinators as to the proper separation between licensees, and whether or not a proposed system will cause harmful interference to existing systems.

As AAR has so clearly shown in its comments to the ITA Blueprint, interference cannot be controlled by simply by drawing a 50-mile circle around a point. Where lives are at stake, as is often the case when an auto club must respond to an emergency call on a busy highway, or in freezing temperatures, interference to such communications may have deadly consequences.

Respectfully submitted,

American Automobile Association

By


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CERTIFICATE OF SERVICE

I, Utokia Davis an employee of the Law Offices of Blooston, Mordkofsky, Jackson & Dickens, certify that a copy of the foregoing Reply Comments was mailed this 12th day of February 1997, by United States first class mail, postage prepaid, to the following:

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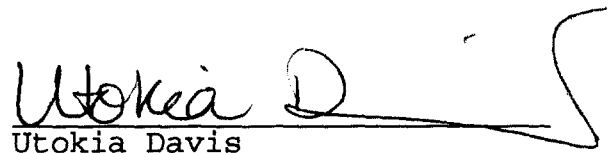
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